

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Criminal Case No. 15-20019  
Hon. Matthew F. Leitman

v.

D-1 TORANIO INGRAM  
D-2 INGRID THOMPSON  
D-3 EDDIE MAURICE-MATTHEW JONES

Defendants.

---

**PROTECTIVE ORDER REGARDING PRODUCTION OF  
TAX RECORDS AND SEARCH WARRANT MATERIALS**

The parties have presented the Court with a joint motion for the entry of a protective order pursuant to Federal Rule of Civil Procedure 16(d)(1) regarding the production of Tax Records and Search Warrant Materials. The Court finds that the requested relief is reasonable and will grant the motion.

Accordingly, it is **ORDERED** that the government shall produce unredacted copies of the subject Tax Records and Search Warrant Materials to defendants Toranio Ingram, Ingrid Thompson, and Eddie Maurice-Matthew Jones (collectively, "the defendants") through their counsel of record in this proceeding.

It is further **ORDERED** that the subject Tax Records and Search Warrant Materials shall only be disclosed to and reviewed by the defendants, their respective counsel of record, investigators and experts retained by defense counsel and defense counsel's support staff. Defense counsel or investigators working at the direction of counsel may utilize or refer to protected materials in the course of any interview of a prospective witness for the government or defense; however, counsel will maintain physical custody of those materials. No person shall provide or otherwise disseminate those materials or the information contained in those materials to any party not specifically described in this Order. Any unauthorized disclosure may constitute a violation of this Court's Order.

It is further **ORDERED** that any filings that include or refer to any of the subject Tax Records and Search Warrant Materials, which filings contain social security numbers, tax identification numbers, dates of birth, the names of individuals known to be minors, financial accounts or home addresses of parties or non-parties, shall be filed in compliance with Rule 49.1 of the Federal Rules of Criminal Procedure and the Electronic Filing Policies and Procedures of the United States District Court for the Eastern District of Michigan.

It is further **ORDERED** that, subject to the motion cut-off date set by this Court, each defendant shall have the right to file a motion seeking to modify the terms of this Order at any time.

s/Matthew F. Leitman

MATTHEW F. LEITMAN

UNITED STATES DISTRICT JUDGE

Dated: February 3, 2015

I hereby certify that a copy of the foregoing document was served upon the parties and/or counsel of record on February 3, 2015, by electronic means and/or ordinary mail.

s/Holly A. Monda

Case Manager

(313) 234-5113